

## **EXHIBIT A**



ELECTRONICALLY FILED  
3/8/2022 11:44 AM  
29-CV-2022-900053.00  
CIRCUIT COURT OF  
ELMORE COUNTY, ALABAMA  
MICHAEL DOZIER, CLERK

State of Alabama Unified Judicial System Form ARCiv-93 Rev. 9/18	<b>COVER SHEET</b> <b>CIRCUIT COURT - CIVIL CASE</b> (Not For Domestic Relations Cases)	Ca: <b>29</b> Date of Filing: <b>03/08/2022</b> <div style="text-align: right;"> <b>CIRCUIT COURT OF</b>  <b>ELMORE COUNTY, ALABAMA</b>  <b>MICHAEL DOZIER, CLERK</b>          Judge Code:       </div>
<b>GENERAL INFORMATION</b>		
<b>IN THE CIRCUIT COURT OF ELMORE COUNTY, ALABAMA</b> <b>STACY THORNTON v. WALGREEN CO., INC.</b>		
<b>First Plaintiff:</b> <input type="checkbox"/> Business <input checked="" type="checkbox"/> Individual <b>First Defendant:</b> <input checked="" type="checkbox"/> Business <input type="checkbox"/> Individual <input type="checkbox"/> Government <input type="checkbox"/> Other <input type="checkbox"/> Government <input type="checkbox"/> Other		
<b>NATURE OF SUIT:</b> Select primary cause of action, by checking box (check only one) that best characterizes your action:		
<b>TORTS: PERSONAL INJURY</b> <input type="checkbox"/> WDEA - Wrongful Death <input checked="" type="checkbox"/> TONG - Negligence: General <input type="checkbox"/> TOMV - Negligence: Motor Vehicle <input type="checkbox"/> TOWA - Wantonness <input type="checkbox"/> TOPL - Product Liability/AEMLD <input type="checkbox"/> TOMM - Malpractice-Medical <input type="checkbox"/> TOLM - Malpractice-Legal <input type="checkbox"/> TOOM - Malpractice-Other <input type="checkbox"/> TBFM - Fraud/Bad Faith/Misrepresentation <input type="checkbox"/> TOXX - Other: _____	<b>OTHER CIVIL FILINGS (cont'd)</b> <input type="checkbox"/> MSXX - Birth/Death Certificate Modification/Bond Forfeiture Appeal/Enforcement of Agency Subpoena/Petition to Preserve <input type="checkbox"/> CVRT - Civil Rights <input type="checkbox"/> COND - Condemnation/Eminent Domain/Right-of-Way <input type="checkbox"/> CTMP - Contempt of Court <input type="checkbox"/> CONT - Contract/Ejectment/Writ of Seizure <input type="checkbox"/> TOCN - Conversion <input type="checkbox"/> EQND - Equity Non-Damages Actions/Declaratory Judgment/Injunction Election Contest/Quiet Title/Sale For Division <input type="checkbox"/> CVUD - Eviction Appeal/Unlawful Detainer <input type="checkbox"/> FORJ - Foreign Judgment <input type="checkbox"/> FORF - Fruits of Crime Forfeiture <input type="checkbox"/> MSHC - Habeas Corpus/Extraordinary Writ/Mandamus/Prohibition <input type="checkbox"/> PFAB - Protection From Abuse <input type="checkbox"/> EPFA - Elder Protection From Abuse <input type="checkbox"/> QTLB - Quiet Title Land Bank <input type="checkbox"/> FELA - Railroad/Seaman (FELA) <input type="checkbox"/> RPRO - Real Property <input type="checkbox"/> WTEG - Will/Trust/Estate/Guardianship/Conservatorship <input type="checkbox"/> COMP - Workers' Compensation <input type="checkbox"/> CVXX - Miscellaneous Circuit Civil Case	
<b>TORTS: PERSONAL INJURY</b> <input type="checkbox"/> TOPE - Personal Property <input type="checkbox"/> TORE - Real Property <b>OTHER CIVIL FILINGS</b> <input type="checkbox"/> ABAN - Abandoned Automobile <input type="checkbox"/> ACCT - Account & Nonmortgage <input type="checkbox"/> APAA - Administrative Agency Appeal <input type="checkbox"/> ADPA - Administrative Procedure Act <input type="checkbox"/> ANPS - Adults in Need of Protective Service		
<b>ORIGIN:</b> F <input checked="" type="checkbox"/> INITIAL FILING    A <input type="checkbox"/> APPEAL FROM DISTRICT COURT    O <input type="checkbox"/> OTHER R <input type="checkbox"/> REMANDED                                    T <input type="checkbox"/> TRANSFERRED FROM OTHER CIRCUIT COURT		
<b>HAS JURY TRIAL BEEN DEMANDED?</b> <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <small>Note: Checking "Yes" does not constitute a demand for a jury trial. (See Rules 38 and 39, Ala.R.Civ.P, for procedure)</small>		
<b>RELIEF REQUESTED:</b> <input checked="" type="checkbox"/> MONETARY AWARD REQUESTED <input type="checkbox"/> NO MONETARY AWARD REQUESTED		
<b>ATTORNEY CODE:</b> <div style="display: flex; justify-content: space-between;"> <div>           HAL120         </div> <div>           3/8/2022 11:44:21 AM  <small>Date</small> </div> <div>           /s/ CARSON SCOTT HALE  <small>Signature of Attorney/Party filing this form</small> </div> </div>		
<b>MEDIATION REQUESTED:</b> <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> UNDECIDED		
<b>Election to Proceed under the Alabama Rules for Expedited Civil Actions:</b> <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		



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3/8/2022 11:44 AM  
29-CV-2022-900053.00  
CIRCUIT COURT OF  
ELMORE COUNTY, ALABAMA  
MICHAEL DOZIER, CLERK

IN THE CIRCUIT COURT FOR ELMORE COUNTY, ALABAMA

STACY THORNTON,

Plaintiff,

v.

WALGREEN CO., INC. and Fictitious  
Defendants "A," "B," and "C," whether  
singular or plural, those other persons,  
corporations, firms or other entities  
whose wrongful conduct caused or  
contributed to cause the injuries and  
damages to Plaintiff, all of whose true  
and correct names are unknown to  
Plaintiff at this time, but will be added  
by amendment when ascertained,

Defendant.

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Case No.: CV - 2022 - \_\_\_\_\_

JURY TRIAL DEMANDED

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COMPLAINT

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This is an action by Plaintiff, Stacy Thornton, (herein after referred to as "Plaintiff") against Defendant, Walgreen Co., Inc., (herein after referred to as "Defendant") for personal injuries and damages sustained by the Plaintiff as the result of a dangerous condition on or about February 10, 2021.

**PARTIES, JURISDICTION, VENUE**

1. The Plaintiff was a resident and citizen of Jefferson County, Alabama at all times material to the issues in this case.
2. Defendant is a corporation that is registered to do business in the state of Alabama at all times material to the issues in this case. Defendant may be served through its registered agent, Corporation Service Company, Inc., at 641 South Lawrence Street, Montgomery, AL 36104.

3. Fictitious Defendants "A", "B" and "C" are other persons and/or entities whose wrongful conduct may have caused and/or contributed to the incident that forms the basis of this Complaint but are unknown to Plaintiff at this time.
4. The incident giving rise to this complaint occurred in Elmore County, Alabama.
5. Venue in Elmore County, Alabama is proper.

#### **APPLICABLE FACTS**

6. On or about February 10, 2021, Plaintiff was at the Defendant's location 795 Wilson St, Wetumpka, Elmore County, Alabama.
7. At said time and place, Plaintiff was an invitee was upon the premises of the Defendant in Elmore County, Alabama.
8. At said time and place, Plaintiff fell and was injured, due to a dangerous condition, specifically the floor not being properly maintained and clear of obstructions.
9. At said time and place, the defendants were responsible for the upkeep and maintenance of the aforementioned premises.

#### **COUNT ONE - NEGLIGENCE**

10. Plaintiff re-alleges and incorporates the preceding paragraphs herein as if they were fully and completely set forth herein.
11. At said time and place, Plaintiff fell when Defendant maintained a dangerous condition with actual or constructive knowledge that Defendant's premises was dangerously maintained and Defendant allowed said condition to be present without warning to the Plaintiff of the presence danger.
12. In causing said known dangerous condition to persist on that certain premises described hereinabove, Defendant:

- (a) Negligently failed to exercise ordinary care.
- (b) Negligently failed to cure a known danger.
- (c) Negligently failed to warn Plaintiff of said known danger.
- (d) Otherwise acted in negligent disregard of the rights and safety of the Plaintiff and

other business invitees.

13. The Plaintiff avers that the acts and conduct of the Defendant constitutes common law negligence.

14. As the proximate consequence of said negligence, Plaintiff was caused to suffer personal injuries, pain, suffering and other damages.

WHEREFORE, Plaintiff demands judgment against the Defendant for all damages, court costs and attorney's fees to which Plaintiff is entitled and for all compensatory damages that it will take to make the Plaintiff fully whole; furthermore, Plaintiff demands any further damages in such an amount as this Court may determine.

#### **COUNT TWO - WANTONNESS**

15. Plaintiff re-alleges and incorporates the preceding paragraphs herein as if they were fully and completely set forth herein.

16. At said time and place, Defendant acted in such a wanton manner in creating and maintaining a known dangerous condition and failing to cure or warn invitee of said dangerous condition, so as to

- (a) cause injury to Plaintiff due to the dangerous condition, and
- (b) cause Plaintiff to undergo doctors appointments, and
- (c) cause the Plaintiff to suffer and sustain the injuries and damages.

17. In causing said known dangerous condition to persist on that certain premises described hereinabove, Defendant:

- (a) Wantonly failed to exercise ordinary care.
- (b) Wantonly failed to cure a known danger.
- (c) Wantonly failed to warn Plaintiff of said known danger.
- (d) Otherwise acted in wanton disregard of the rights and safety of the Plaintiff and others business invitees.

18. The Plaintiff avers that the acts and conduct of the Defendant constitutes wantonness.

19. As the proximate consequence of said negligence, Plaintiff was caused to suffer personal injuries, pain, suffering and other damages.

WHEREFORE, Plaintiff demands judgment against the Defendant for all damages, court costs and attorney's fees to which Plaintiff is entitled and for all compensatory damages that it will take to make the Plaintiff fully whole; furthermore, Plaintiff demands any further damages in such an amount as this Court may determine.

### **COUNT THREE – FICTITIOUS DEFENDANTS**

20. Plaintiff re-alleges and incorporates the preceding paragraphs herein as if they were fully and completely set forth herein.

21. Fictitious Defendant "A", "B", and "C", whether singular or plural, are those other persons, firms, corporations, or other entities whose negligent, wanton, reckless and wrongful conduct contributed to the injuries sustained by the Plaintiff, said Fictitious Defendant names are unknown to Plaintiff at this time, but will be promptly substituted by amendment when ascertained.

WHEREFORE, Plaintiff demands judgment against Fictitious Defendants "A", "B", and "C", both jointly and severally, for all compensatory damages, court costs and attorney's fees to which

Plaintiff is entitled. Furthermore, Plaintiff demands punitive damages in such an amount as this Court may determine.

**JURY DEMANDED AS TO ALL COUNTS OF THE COMPLAINT**

This March 8, 2022.

Respectfully submitted,

/s/ Carson S. Hale

CARSON S. HALE (HAL120)  
ATTORNEY FOR PLAINTIFF

**OF COUNSEL:**  
**SLOCUMB LAW FIRM, LLC**  
145 E. Magnolia Ave  
Suite 201  
Auburn, Alabama 36830  
Tel. No. (334) 741-4110  
Fax No. (888)-853-2247

**(the rest of this page left blank intentionally)**

**REQUEST FOR SERVICE OF PROCESS**

The Plaintiff hereby requests that the Summons and Complaint in this case be served on the following Defendant by Certified Mail at her respective mailing address as follows:

**Walgreen Co., Inc.**  
Registered agent: Corporation Service Company, Inc.  
641 South Lawrence Street  
Montgomery, AL 36104

/s/ Carson S. Hale  
CARSON S. HALE  
OF COUNSEL

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CIRCUIT COURT OF  
ELMORE COUNTY, ALABAMA  
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**IN THE CIRCUIT COURT FOR ELMORE COUNTY, ALABAMA**

**STACY THORNTON,**

**Plaintiff,**

**v.**

**WALGREEN CO., INC. and Fictitious  
Defendants "A," "B," and "C," whether  
singular or plural, those other persons,  
corporations, firms or other entities  
whose wrongful conduct caused or  
contributed to cause the injuries and  
damages to Plaintiff, all of whose true  
and correct names are unknown to  
Plaintiff at this time, but will be added  
by amendment when ascertained,**

**Defendant.**

**Case No.: CV - 2022 - \_\_\_\_\_**

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**PLAINTIFF'S FIRST INTERROGATORIES AND REQUESTS FOR  
PRODUCTION OF DOCUMENTS TO DEFENDANT WALGREEN CO., INC.**

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COMES NOW the Plaintiff in the above-styled action, by counsel, and propounds the following interrogatories to the Defendant, pursuant to Rule 33 of the A.R.C.P. to be answered under oath within 45 days of service hereof:

**Definitions and Instructions**

- a. These interrogatories are continuing in character so as to require you to file supplementary answers if you obtain further or different information before trial.
- b. Where the name of a person is requested, indicate the full name, home and business address and home and business telephone number of such person.

c. Unless otherwise indicated, these interrogatories refer to the time, place, and circumstances of the occurrences mentioned or complained of in Plaintiff's Complaint.

d. Where information of knowledge and possession of a party is requested, such request includes knowledge of the party's agent, next friend, guardian, representatives, and unless privileged, their attorney.

e. The pronoun "you" refers to the party to whom these interrogatories are addressed, and the person or persons mentioned in clause (D).

### **INTERROGATORIES**

1. Please identify the individual(s) responding to these Interrogatories, including their present job title.

#### **RESPONSE:**

2. Please identify your relationship to or dealings with all known defendants in this action.

#### **RESPONSE:**

3. Please state, in your own words, what you believe happened to Plaintiff, on February 10, 2021, at or within the premises of your location, at 795 Wilson St, Wetumpka, AL, and include in your Answer the basis upon which you have formed that belief.

#### **RESPONSE:**

4. Please produce any and all documents or other tangible evidence in your custody, possession, or control that in any way refers to or supports your response to Interrogatory No. 3. Such documents include, but are not limited to, incident reports, records, schedules, notes,

memorandum, correspondence, communications, letters, photographs, video, audio recordings, maps, diagrams, drawings, design documents, or other tangible evidence.

**RESPONSE:**

5. State the full name and address of each person who witnessed or claims to have witnessed the subject incident.

**RESPONSE:**

6. Identify the individual, entity, or entities responsible for ensuring the safety of the premises at issue in this matter as of February 10, 2021.

**RESPONSE:**

7. What governmental, industry, or safety organization standards, codes or regulations pertain to the use of the premises in question and its design? State for each standard the date such standard promulgated, the sponsoring body, and whether the Defendant claims such standard was complied with in connection with the use of the product in question.

**RESPONSE:**

8. Please identify any procedures or processes in place to ensure compliance with all relevant governmental or industry safety standards concerning the installation, operation, and maintenance of the subject premises.

**RESPONSE:**

9. Please specifically describe any work you deemed necessary to make the area at issue in this matter fully compliant with any relevant governmental or industry standard, identify whether such work was performed and, if so, when such work was performed, and please describe the entity performing said work.

**RESPONSE:**

10. Please identify any instances in which the subject premises has been found to be non-compliant with any industry or governmental safety regulation.

**RESPONSE:**

11. Please describe and identify all correspondence, notes, memoranda, notices, warnings, complaints, letters, or other documents reflecting any communications among or between Defendant and Plaintiff.

**RESPONSE:**

12. Please describe and identify all correspondence, notes, memoranda, notices, warnings, complaints, letters or other documents reflecting any communications among or between Defendant, or employees or anyone acting on Defendant's behalf, with any non-party to this litigation.

**RESPONSE:**

13. List the name, address and telephone number of each person likely to have discoverable information about the claims and defenses in this case, even if you do not intend on calling that person as a witness.

**RESPONSE:**

14. Please identify each person, corporation, or other entity responsible for causing the subject incident and please fully explain why each person, corporation or other entity listed in response to the previous interrogatory is so listed, including any explanation of fault on that person or entity's behalf.

**RESPONSE:**

15. If you contend that Plaintiff is in any way responsible causing the subject incident, please explain each and every reason therefore in complete and exact detail.

**RESPONSE:**

16. Identify all persons whom you intend to call as an expert witnesses at the trial of this case, and for each such expert, identify:

- a. The subject matter on which he or she is expected to testify:
- b. The substance of the facts and opinions to which he or she is expected to testify:
- c. A summary of the grounds for each opinion to which he or she will testify;
- d. The basis upon which he or she qualifies as an expert on the subject matter to which he or she is expected to testify.

**RESPONSE:**

17. Please state all facts in support of your denial of any allegation in Plaintiff's Complaint.

**RESPONSE:**

18. If you contend that any of the injuries claimed by Plaintiff are not the result of the subject incident, please describe in detail the basis for such contention, identify all persons having knowledge of any facts supporting this contention, and identify all documents supporting this contention, as well as the specific event which brought about any unrelated injuries.

**RESPONSE:**

19. If you contend that the medical treatment received by the Plaintiff subsequent to the subject incident and claimed as damages in this action was/is not reasonable, not medically necessary, or not causally related to the subject incident, please describe in detail the basis for such contention, identify all persons having knowledge of any facts supporting this contention, and identify all documents supporting this contention.

**RESPONSE:**

20. Do you contend that the Plaintiff, or any other Party or entity, failed to heed or comply with any instruction or warning in connection with the occurrence in question or in any other way negligently caused the Plaintiff's incident? Explain. If so, does Defendant contend that such failure, if any, on the part of the Plaintiff had any causal connection with the Plaintiff's injuries?

**RESPONSE:**

21. Identify any warnings, whether verbal or written (such as by a sign, or otherwise) which were given to the Plaintiff, specifically, and/or to the public or employees working in that building or to anyone using the premises, in general, before the incident concerning the condition which caused or contributed to the incident complained of in this lawsuit.

**RESPONSE:**

22. Identify any admission(s) or declaration(s) against interest which you contend was made by the Plaintiff following the incident in question.

**RESPONSE:**

23. At the time of the subject incident do you contend that any person or entity other than you and your employees and agents was responsible for the maintenance of the premises on which Plaintiff alleges she was injured and, if so, state each and every fact on which you base your contention and identify each and every writing that supports the contention?

**RESPONSE:**

24. Describe in detail any conversations you or your representative has had with the Plaintiff related to the subject incident either prior to or subsequent to the subject incident.

**RESPONSE:**

25. What efforts were made by you or any other person or entity to correct the condition which Plaintiff contends caused the occurrence in question subsequent to the incident in question?

**RESPONSE:**

26. Please identify any contractual relationship entered into with any individual or entity regarding the maintenance and operation of the premises at issue and identify any established maintenance schedule.

**RESPONSE:**

27. Please describe what training procedures, if any, are followed in the course of training of your employees with regard to premises safety or injuries occurring within the premises at issue. This includes any and all written material, slides, photographs, films, videotapes, etc. which Defendant utilizes in training its employees.

**RESPONSE:**

28. With regard to the incident which forms the basis of Plaintiff's Complaint, please identify each policy of insurance which might afford liability coverage to you and any excess, umbrella, or other policies. For each policy listed, state the name and address of the named insured(s) and of the insurance company, the operative policy number, the operative liability limits for personal injury and property damage, and whether question or doubt exists as to your rights under the policy (reservation of rights, non-waiver agreement, etc.).

**RESPONSE:**

29. Identify any document or thing that you intend to use as exhibit in the trial of this matter.

**RESPONSE:**



30. Identify any documents received in response to any subpoena issued by you in this case.

**RESPONSE:**

31. Please list all materials reasonably expected or intended to be used at trial for attempted impeachment of Plaintiff, including depositions, medical literature and any and all other impeachment materials of any type, and or variety.

**RESPONSE:**

32. State the name, address and telephone number of any individual having knowledge of any matter relevant to the issues in this lawsuit, including any individual having knowledge to be used in the impeachment of any witness or party.

**RESPONSE:**

**REQUESTS FOR PRODUCTION**

COMES NOW the Plaintiff, by and through counsel, that the Defendant produce for inspection and/or copying by Plaintiff's counsel the following documents set forth below. As an alternative the Defendant may produce true and accurate photocopies of the documents set forth. Such documents requested shall be produced at the offices of the undersigned counsel within forty-five (45) days from the date of service or at such other time or place as mutually agreed upon by the parties.

If any of the documents requested are not produced because of privilege or other reason, please identify such documents, state the nature of the objection or nature of the privilege or other reason for non-production so the Plaintiff may take appropriate remedial steps if necessary.

The word document shall include, but not necessarily be limited to, all written or printed matter of any kind, copies of books, records, reports, sketches, drawings, advertisements, notes, letters, schedules, contracts, purchase orders, bills, or any other document relating to this claim which is discoverable by law, as well as any other tangible thing upon which information is recorded in writing.

#### **DOCUMENTS REQUESTED**

1. Please produce any and all incident and/or incident reports and investigations prepared by you or your representative as a result of subject incident.
2. Please produce copies of all photographs, video tapes, slides and motion pictures in your possession which are relevant to the allegations of Plaintiff's Complaint and Defendant's Answer and defenses.
3. Produce copies of all insurance policies (including the declaration page) potentially applicable to this claim.
4. Please produce all documents used, referenced or reviewed in answering the interrogatories, which were simultaneously served herewith.
5. Please produce any notes or other documents which you have made concerning the subject incident.

6. Please produce any and all recorded statements (whether oral, written, or any other form) of any witnesses to the subject incident.
7. Please produce any and all diagrams, photographs, videotapes or computer simulations of area in which the subject incident occurred, including the premises at issue.
8. Please produce any and all photographs of any person, structure, or building damaged in the subject incident.
9. Please produce all documents concerning the installation, maintenance, or operation of the premises at issue in this case, including any related correspondence with any Defendant, and any relevant safety materials.
10. Please produce all documentation related to any efforts you deemed necessary to make the premises at issue in this matter fully compliant with any relevant governmental or industry standard, identify whether such work was performed, when such work was performed, and please describe the entity performing said work.
11. Please produce all correspondence with any entity or person related to safety standards for the premises at issue in this case.
12. Please produce any and all standards, codes, rules, regulations, or statutes that will be relied upon in defense of this case.
13. Produce any documents which establish which individual, entity, or entities had custody of the premises at issue as of the date of the subject incident.
14. Produce a copy of any documents which establish which individual, entity, or entities which were responsible for the ensuring the safety of the premises at issue as of the date of the subject incident.

15. Please produce all records regarding compliance with all relevant governmental or industry safety standards.
16. Any and all documents that you claim constitute an admission(s) or declaration(s) against interest concerning any facts or matters alleged in the Complaint.
17. Please produce all written reports, all correspondence, all invoices, and the complete file for any expert witness you intend to call at trial.
18. Please produce a copy of any complaints you received related to the premises at issue.
19. Please produce all documents which support your denial of any allegations in Plaintiff's Complaint, or any affirmative defenses you rely upon in your Answer.
20. Please produce any documents received in response to any subpoena issued by you in this case.
21. Please produce any document or thing that you intend to use as exhibit in the trial of this matter.
22. Please produce all documents which you may use for demonstrative purposes at the trial of this action, and all documents you may use for impeachment purposes at the trial of this action.

This March 8, 2022.

Respectfully submitted,

/s/ Carson S. Hale  
CARSON S. HALE (HAL120)  
ATTORNEY FOR PLAINTIFF

**OF COUNSEL:**  
**SLOCUMB LAW FIRM, LLC**  
145 E. Magnolia Ave

Suite 201  
Auburn, Alabama 36830  
Tel. No. (334) 741-4110  
Fax No. (888)-853-2247

**(the rest of this page left blank intentionally)**

**REQUEST FOR SERVICE OF PROCESS**

The Plaintiff hereby requests that the Summons and Complaint in this case be served on the following Defendant by Certified Mail at her respective mailing address as follows:

**Walgreen Co., Inc.**  
Registered agent: Corporation Service Company, Inc.  
641 South Lawrence Street  
Montgomery, AL 36104

/s/ Carson S. Hale  
CARSON S. HALE  
OF COUNSEL

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AlaFile E-Notice

29-CV-2022-900053.00

To: WALGREEN CO., INC.  
641 S. LAWRENCE ST.  
MONTGOMERY, AL, 36104

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## NOTICE OF ELECTRONIC FILING

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IN THE CIRCUIT COURT OF ELMORE COUNTY, ALABAMA

STACY THORNTON V. WALGREEN CO., INC.  
29-CV-2022-900053.00

The following complaint was FILED on 3/8/2022 11:44:19 AM

Notice Date: 3/8/2022 11:44:19 AM

MICHAEL DOZIER  
CIRCUIT COURT CLERK  
ELMORE COUNTY, ALABAMA  
ELMORE COUNTY JUDICIAL CENTER  
P.O. BOX 310  
WETUMPKA, AL, 36092

334-514-3116  
michael.dozier@alacourt.gov

## DOCUMENT 5

State of Alabama Unified Judicial System Form C-34 Rev. 4/2017	<b>SUMMONS</b> <b>- CIVIL -</b>	<b>Court Case Number</b> <b>29-CV-2022-900053.00</b>
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**IN THE CIRCUIT COURT OF ELMORE COUNTY, ALABAMA**  
**STACY THORNTON V. WALGREEN CO., INC.**

**NOTICE TO:** WALGREEN CO., INC., 641 S. LAWRENCE ST., MONTGOMERY, AL 36104  
 \_\_\_\_\_  
*(Name and Address of Defendant)*

THE COMPLAINT OR OTHER DOCUMENT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT, AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS. YOU OR YOUR ATTORNEY ARE REQUIRED TO FILE THE ORIGINAL OF YOUR WRITTEN ANSWER, EITHER ADMITTING OR DENYING EACH ALLEGATION IN THE COMPLAINT OR OTHER DOCUMENT, WITH THE CLERK OF THIS COURT. A COPY OF YOUR ANSWER MUST BE MAILED OR HAND DELIVERED BY YOU OR YOUR ATTORNEY TO THE PLAINTIFF(S) OR ATTORNEY(S) OF THE PLAINTIFF(S),  
 CARSON SCOTT HALE  
 \_\_\_\_\_  
*(Name(s) of Attorney(s))*

WHOSE ADDRESS(ES) IS/ARE: 145 E. MAGNOLIA AVE. SUITE 201, AUBURN, AL 36830  
 \_\_\_\_\_  
*(Address(es) of Plaintiff(s) or Attorney(s))*

THE ANSWER MUST BE MAILED OR DELIVERED WITHIN 30 DAYS AFTER THIS SUMMONS AND COMPLAINT OR OTHER DOCUMENT WERE SERVED ON YOU OR A JUDGMENT BY DEFAULT MAY BE RENDERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT OR OTHER DOCUMENT.

**TO ANY SHERIFF OR ANY PERSON AUTHORIZED BY THE ALABAMA RULES OF CIVIL PROCEDURE TO SERVE PROCESS:**

☐ You are hereby commanded to serve this Summons and a copy of the Complaint or other document in this action upon the above-named Defendant.

☒ Service by certified mail of this Summons is initiated upon the written request of STACY THORNTON  
 pursuant to the Alabama Rules of the Civil Procedure. *(Name(s))*

\_\_\_\_\_  
 03/08/2022 /s/ MICHAEL DOZIER By: \_\_\_\_\_  
*(Date)* *(Signature of Clerk)* *(Name)*

☒ Certified Mail is hereby requested. /s/ CARSON SCOTT HALE  
*(Plaintiffs/Attorney's Signature)*

**RETURN ON SERVICE**

☐ Return receipt of certified mail received in this office on \_\_\_\_\_  
*(Date)*

☐ I certify that I personally delivered a copy of this Summons and Complaint or other document to \_\_\_\_\_  
 \_\_\_\_\_ in \_\_\_\_\_ County,  
*(Name of Person Served)* *(Name of County)*

Alabama on \_\_\_\_\_  
*(Date)*

\_\_\_\_\_  
*(Type of Process Server)*

\_\_\_\_\_  
*(Server's Signature)*

\_\_\_\_\_  
*(Address of Server)*

\_\_\_\_\_  
*(Server's Printed Name)*

\_\_\_\_\_  
*(Phone Number of Server)*



Michael Dozier, Circuit Clerk  
P.O. Box 310  
Wetumpka, AL 36092



7021 2720 0002 0381 2540

NEOPOST FIRST-CLASS MAIL  
03/09/2022  
US POSTAGE \$008.76<sup>0</sup>  
ZIP 36092  
041M1.1452367

Wagner Co., Inc.  
641 S Lawrence St  
Montgomery, AL 36104



## Notice of Service of Process

Transmittal Number: 24596097  
Date Processed: 03/11/2022

**Primary Contact:** Walgreens Distribution  
Corporation Service Company- Wilmington, DELAWARE  
251 Little Falls Dr  
Wilmington, DE 19808-1674

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<b>Entity:</b>	Walgreen Co., Inc. Entity ID Number 0501431
<b>Entity Served:</b>	Walgreen Co., Inc
<b>Title of Action:</b>	Stacy Thornton vs. Walgreen Co., Inc.
<b>Matter Name/ID:</b>	Stacy Thornton vs. Walgreens (10976596)
<b>Document(s) Type:</b>	Summons/Complaint
<b>Nature of Action:</b>	Personal Injury
<b>Court/Agency:</b>	Elmore County Circuit Court, AL
<b>Case/Reference No:</b>	29-CV-2022-900053.00
<b>Jurisdiction Served:</b>	Alabama
<b>Date Served on CSC:</b>	03/10/2022
<b>Answer or Appearance Due:</b>	30 Days
<b>Originally Served On:</b>	CSC
<b>How Served:</b>	Certified Mail
<b>Sender Information:</b>	Slocumb Law Firm, LLC 334-741-4110

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**To avoid potential delay, please do not send your response to CSC**

251 Little Falls Drive, Wilmington, Delaware 19808-1674 (888) 690-2882 | [sop@cscglobal.com](mailto:sop@cscglobal.com)